

**IN THE DISTRICT COURT OF THE VIRGIN ISLANDS
DIVISION OF ST. CROIX**

NICOLE WOOTEN,

Plaintiff,

v.

LIMETREE BAY TERMINALS d/b/a
OCEAN POINT TERMINALS, PORT
HAMILTON REFINING AND
TRANSPORTATION, and WEST INDIES
PETROLEUM, LTD.,

Defendants.

Case No. 1:23-CV-00012

ACTION FOR DAMAGES

JURY TRIAL DEMANDED

MOTION FOR ENTRY OF DEFAULT

COMES NOW Plaintiff, by and through undersigned counsel, and hereby requests that the Clerk of the Court, pursuant to Federal Rules of Civil Procedure 55(a), enter a Default against Defendant West Indies Petroleum, Ltd. for failure to defend or otherwise plead in this action. In support of the Request for Entry of Default, Plaintiff refers to the attached Affirmation.

RESPECTFULLY SUBMITTED
LEE J. ROHN AND ASSOCIATES, LLC
Attorneys for Plaintiff

DATED: March 28, 2023

BY: /s/ Lee J. Rohn

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Wooten, Nicole v. Limetree Bay Terminals, et. al., Case No. 1:23-CV-00012
Motion for Entry of Default

CERTIFICATE OF SERVICE

THIS IS TO CERTIFY that on March 28, 2023, I electronically filed the foregoing with the Clerk of the Court using the electronic filing system, which will send a notification of such filing to the following:

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BY: /s/ Lee J. Rohn (kj)